

FILED

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**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICAELA DE GRACIA,

Defendant.

No.

4:17CR00071 RLW/DDN

INDICTMENT

The Grand Jury charges that:

On or about December 15, 2016, in the Eastern District of Missouri, the defendant,

MICAELA DE GRACIA,

did intentionally traffic in goods and did knowingly use counterfeit marks on and in connection with such goods at her store which was doing business as Play Time Soccer Specialty Store in St. Charles County, to wit: large quantities of apparel purportedly manufactured by Adidas and others and purportedly bearing the marks and logos of various national soccer teams and professional soccer clubs. Said counterfeit goods having a suggested retail value, if authentic, of more than \$100,000.00.

In violation of Title 18, United States Code Section 2320.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 2323, upon conviction of an offense in violation of Title 18, United States Code, Section 2320 as set forth above, the defendant shall forfeit to the United States of America any article, the making or trafficking of which is

prohibited by any statute identified in Title 18, United States Code, Section 2323(a)(1)(A); any property used or intended to be used in any manner or part to commit or facilitate the commission of said offense; and any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of said offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of said offense.

3. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. 289 Adidas shirts;
- b. 317 pair Adidas shorts;
- c. 6 Adidas jackets;
- d. 2 pair Adidas pants;
- e. 20 Adidas suits;
- f. 12 Adidas running suits;
- g. 7 AUF shirts;
- h. 5 pair AUF shorts;
- i. 3 pair Guadalajara shorts;
- j. 5 Guadalajara shirts;
- k. 5 pair Honduras shorts;
- l. 6 Honduras shirts;
- m. 6 Ptolomeo shirts;
- n. 5 pair Ptolomeo shorts;

- o. 9 pair Bayer shorts;
- p. 9 Bayer shirts;
- q. 17 Bayer jackets;
- r. 2 Bayer shirts;
- s. 12 pair Bayer shorts;
- t. 1 Chelsea jacket;
- u. 16 pair Chelsea shorts;
- v. 1 Guadalajara jacket;
- w. 50 U.S.A. shirts;
- x. 7 U.S.A. jackets;
- y. 76 pair U.S.A. shorts;
- z. 19 Roma shirts;
- aa. 19 pair Roma shorts;
- bb. 8 Chile shirts;
- cc. 10 pair Chile shorts;
- dd. 3 Kappa shirts;
- ee. 1 pair Kappa shorts;
- ff. 5 Leicester City shirts;
- gg. 4 pair Leicester City shorts;
- hh. 30 CBF Brazil shirts;
- ii. 33 pair CRF Brazil shorts;
- jj. 65 BBB shirts;
- kk. 64 pair BBB shorts;

- ll. 63 pair FCB shorts;
- mm. 11 FCB running suits;
- nn. 14 FCB jackets;
- oo. 5 FCB shirts;
- pp. 10 Mexica shirts;
- qq. 14 pair Mexico shorts;
- rr. 8 Mexico jackets;
- ss. 33 Liverpool shirts;
- tt. 84 pair Liverpool shorts;
- uu. 32 pair Italia shorts;
- vv. 4 Italia jackets;
- ww. 29 Italia shirts;
- xx. 5 Real Madrid jackets;
- yy. 13 Real Madrid shirts;
- zz. 30 pair real Madrid shorts;
- aaa. 7 Arsenal running suits;
- bbb. 36 FPF Portugal shirts;
- ccc. 40 pair FBF Portugal shorts;
- ddd. 3 pair Paris shorts;
- eee. 6 Paris shirts;
- fff. 6 Deutscher jackets;
- ggg. 43 pair Deutscher shorts;
- hhh. 12 CA shirts;

- iii. 16 pair CA shorts;
- jjj. 5 CA jackets;
- kkk. 1 Manchester United shirt;
- lll. 38 pair Manchester United shorts;
- mmm. 2 Manchester United jackets;
- nnn. 23 pair Parus shorts;
- ooo. 4 pair Juventas shorts;
- ppp. 1 Juventas shirt;
- qqq. 6 Deportivo Cruz Azu Mexico shirts;
- rrr. 7 pair Deportivo Cruz Azu Mexico shorts;
- sss. 41 Manchester City shirts;
- ttt. 48 pair Manchester City shorts;
- uuu. 16 pair FCC shorts;
- vvv. 9 pair Madria shorts;
- www. 1 Tottenham shirt;
- xxx. 14 pair Tottenham shorts;
- yyy. 53 pair Arsenal shorts;
- zzz. 38 Arsenal shirts;
- aaaa. 7 Arsenal jackets;
- bbbb. 35 FCB shirts;
- cccc. 3 pair FCB shorts;
- dddd. 41 pair FCB shorts;

4. If any of the property described above, as a result of any act or omission

of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Thomas C. Albus, #96250
Assistant United States Attorney